

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): 1/18/13
2. Deadline for first request for production of documents and first request for interrogatories: 1/31/13
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) _____ ; defendant(s) _____
3. Date for completion of any joinder of additional parties and amendment of the pleadings: 3/29/13
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) _____ ; defendant(s) _____
4. Number of depositions by plaintiff(s) of: parties _____ ; non-parties _____
5. Number of depositions by defendant(s) of: parties _____ ; non-parties _____
6. Date of status conference (Depositions to be taken as permitted by FRCP joint status report due two business days in advance): _____
7. Date for completion of factual discovery: 6/28/13
8. Are expert witnesses needed? To be determined. Yes ____ No ____
- 8(a). Number of expert witnesses, if any, of plaintiff(s): medical _____ ; non-medical _____
- 8(b). Date for completion of those expert reports: _____
- 8(c). Number of expert witnesses, if any, of defendant(s): medical _____ ; non-medical _____
- 8(d). Date for completion of those expert reports: _____
9. Date for completion of expert discovery: _____
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via fax two business days in advance): _____

11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: motion for summary judgment

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions: _____

13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes ____ No x
14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes ____ No x
15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes ____ No ____